

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 3/8/11
2. Deadline for first request for production of documents and first request for interrogatories (if later than the date of the initial conference, please explain why on a separate page): 3/8/11
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) 0 ; defendant(s) 0
3. Date for completion of any joinder of additional parties and amendment of the pleadings: 4/9/11
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 1-2 ; defendant(s) 0
4. Number of depositions by plaintiff(s) of: parties 3-4; non-parties 2
5. Number of depositions by defendant(s) of: parties 2 ; non-parties 2
6. Date of status conference (joint status report due two business days in advance): _____
7. Date for completion of factual discovery: 7/8/11
8. Are expert witnesses needed? Yes No X
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical n/a; non-medical n/a
- 8(b). Date for completion of those expert reports: n/a
- 8(c). Number of expert witnesses, if any, of defendant(s): medical n/a ; non-medical n/a
- 8(d). Date for completion of those expert reports: n/a
9. Date for completion of expert discovery: n/a
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via fax two business days in advance): _____

11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: summary judgment
8/12/11
12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: summary judgment
8/12/11
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes No X
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes No n/a
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes No X